

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Docket No. 20-cr-10012-IT
)	
)	
PAUL BATEMAN)	
)	

ASSENTED-TO MOTION TO MODIFY PRETRIAL RELEASE CONDITION

Now comes the defendant Paul Bateman and hereby moves to modify his pretrial release condition requiring home detention. After consultation with U.S. Probation and with the assent of the government, Mr. Bateman moves to modify Condition (7)(p) to remove the requirement that he be subject to home detention, and order that he instead be subject to a daily curfew of 8:00 p.m.-7:00 a.m., and to permit probation to exercise discretion to amend the curfew for employment purposes. *See* Order Setting Conditions of Release. (*See* D.E. #9).

As grounds, Mr. Bateman has been supervised on conditions of release since December 2019. Since that time, he has been subject to home detention with leave for work, and has been in total compliance with that restrictive location condition. Undersigned counsel conferred with Mr. Bateman's supervising pretrial services officer and understands that Probation would support a step-down from home detention, to a daily curfew instead. Pursuant to Local Rule 7.1, counsel conferred with the government and understands that the government assents to this motion.

Respectfully submitted,
PAUL BATEMAN
By His Attorney,

/s/ Sandra Gant
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CERTIFICATE OF SERVICE

I, Sandra Gant, hereby certify that this document filed through the ECF system will be sent electronically to the registered participant(s) as identified on the Notice of Electronic Filing (NEF) on April 21, 2023.

/s/ Sandra Gant
Sandra Gant